

IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF COLUMBIA

UNITED STATES OF AMERICA,	)	
	)	
Plaintiff,	)	
	)	
v.	)	Civil Action No. 99-CV-2496 (GK)
	)	
PHILIP MORRIS INCORPORATED,	)	
et al.,	)	
	)	
Defendants.	)	

**LORILLARD TOBACCO COMPANY'S RESPONSES TO UNITED STATES' FIRST SET OF INTERROGATORIES TO DEFENDANTS**

Lorillard Tobacco Company ("Lorillard") responds to United States' First Set of Interrogatories to Defendants ("Interrogatories") as follows:

**DEFINED OBJECTIONS**

The Defined Objections are set forth below to avoid restating objections to certain of Plaintiff's Interrogatories and, as appropriate, are specifically incorporated into Lorillard's responses to Plaintiff's Interrogatories. The underlined heading of each Defined Objection is provided only for ease of reference, is not intended to define or limit the scope of the Defined Objection, and is not to be considered a substantive part of the Defined Objection.

A. Documents Available to Plaintiff: Lorillard objects to these Interrogatories on the grounds that they are overly broad and unduly burdensome to the extent that they would require Lorillard to undertake a burdensome document review to ascertain responsive information, when Lorillard has already provided documents that may contain responsive information to Plaintiff and when these documents are publicly available to Plaintiff in the Minnesota Depository and on the

**ANSWER:** Lorillard incorporates by reference Defined Objections A ("Documents Available to Plaintiff"), B ("Unreasonable Time"), and C ("Publicly Available Documents"). Lorillard further objects to this Interrogatory on the grounds that it is unduly burdensome to the extent it purports to require Lorillard to identify "Each Person" with knowledge regarding the referenced subject, which could include hundreds of individuals currently and formerly employed by Lorillard. Lorillard also objects to this Interrogatory because it must speculate as to the exact meaning Plaintiff places on the phrases "health effects and risks" and "all facts known," which are subject to varying interpretations and are, therefore, vague and ambiguous. Lorillard further objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome.

Subject to and without waiving these or the Objections to Plaintiff's Instructions and Definitions stated above, Lorillard further states that the following individual at Lorillard has knowledge regarding the referenced subject:

Christopher R.E. Coggins  
Senior Vice President, Science & Technology  
420 English Street  
Greensboro, North Carolina

Additionally, Lorillard refers Plaintiff to documents that Lorillard referenced or agreed to produce in response to Request Nos. 2 and 151 of Plaintiff's Comprehensive Requests for Production of Documents to All Defendants. Lorillard refers Plaintiff to those documents because the burden of deriving or ascertaining responsive information from the documents is substantially the same for Plaintiff as it is for Lorillard.

**INTERROGATORY NO. 10:** List Each disease or medical condition that you have concluded is caused by smoking cigarettes, and state all facts regarding your conclusion regarding the causal relationship between cigarette smoking and Each disease or medical condition listed.

**ANSWER:** Lorillard incorporates by reference Defined Objections A ("Documents Available to Plaintiff"), B ("Unreasonable Time"), and C ("Publicly Available Documents"). Lorillard further objects to this Interrogatory on the grounds that it is overly broad and unduly burdensome.

Subject to and without waiving these or the Objections to Plaintiff's Instructions and Definitions stated above, Lorillard agrees with the Surgeon General and other public health authorities that, based on the epidemiological standard of causation, cigarette smoking can be a cause of lung cancer, heart disease and chronic obstructive pulmonary disease, including emphysema.

Additionally, Lorillard refers Plaintiff to documents that Lorillard referenced or agreed to produce in response to Request No. 80 of Plaintiff's Comprehensive Requests for Production of Documents to All Defendants. Lorillard refers Plaintiff to those documents because the burden of deriving or ascertaining responsive information from the documents is substantially the same for Plaintiff as it is for Lorillard.

**INTERROGATORY NO. 11:** For the years 1950 to the present, Identify Each Person employed by You with knowledge concerning Addiction to nicotine, cigarettes, or cigarette smoking, and describe all facts known by Each such person so identified.

**ANSWER:** Lorillard incorporates by reference Defined Objections A ("Documents Available to Plaintiff"), B ("Unreasonable Time"), and C ("Publicly Available Documents"). Lorillard further objects to this Interrogatory on the grounds that it is unduly burdensome to the extent it purports to require Lorillard to identify "Each Person" with knowledge regarding the referenced subject, which could include hundreds of individuals currently and formerly employed by Lorillard. Lorillard also objects to this Interrogatory because it must speculate as to the exact meaning Plaintiff places on the phrase "all facts known," which is subject to varying interpretations